

1 **ARNOLD & PORTER**  
2 **KAYE SCHOLER LLP**  
3 JAMES F. SPEYER (Bar No. 133114)  
james.speyer@arnoldporter.com  
777 South Figueroa Street, 44th Floor  
4 Los Angeles, CA 90017-5844  
5 Tel: 213.243.4000 / Fax: 213.243.4199

6 *Attorneys for Defendant*  
7 EPOCH EVERLASTING PLAY, LLC  
8 (additional counsel listed on signature  
page)

9 **K&L GATES LLP**  
10 KEVIN S. ASFOUR (SBN 228993)  
kevin.asfour@klgates.com  
11 10100 Santa Monica Blvd., 8th Floor  
Los Angeles, CA 90067  
12 Tel: (310) 552-5000

13 *Attorneys for Defendant*  
14 AMAZON.COM SERVICES LLC  
15 (additional counsel listed on signature page)

16 **WADE KILPELA SLADE LLP**  
17 Gillian L. Wade, State Bar No. 229124  
g Wade@waykayslay.com  
18 Sara D. Avila, State Bar No. 26321  
sara@waykayslay.com  
19 Marc A. Castaneda, State Bar No. 299001  
marc@waykayslay.com  
20 2450 Colorado Ave., Ste. 100E  
Santa Monica, CA 90404  
21 Tel: (310) 396-9600

22 *Attorneys for Plaintiff and the Putative*  
23 *Class*  
24 (additional counsel listed on signature  
page)

25  
26 UNITED STATES DISTRICT COURT  
27 CENTRAL DISTRICT OF CALIFORNIA

28 WILLIENE JACKSON-JONES,  
individually and on behalf of all others  
situated,

Plaintiff,

vs.

EPOCH EVERLASTING PLAY, LLC, a  
Delaware limited liability company, and  
AMAZON.COM SERVICES LLC, a  
Delaware corporation,

Defendants.

Case No.: 2:23-cv-02567-ODW-SK  
**JOINT STIPULATION TO  
EXTEND CASE SCHEDULE**

1 **STIPULATION**

2 WHEREAS, on November 14, 2023, the Court entered the Scheduling and  
3 Case Management Order, which set forth certain discovery, motions, pre-trial and  
4 trial deadlines (ECF 44);

5 WHEREAS, all Parties have been working and continue to work diligently to  
6 advance fact and expert discovery in this case pursuant to the Scheduling and Case  
7 Management Order, including actively conferring in good faith regarding discovery  
8 disputes and ongoing production of documents;

9 WHEREAS, key witnesses—corporate representatives of Defendant Epoch  
10 Everlasting Play, LLC and Defendant Amazon.com Services LLC—are unavailable  
11 for depositions until late October or early November due to international business  
12 travel, hosting of various business meetings, and other work-related obligations;

13 WHEREAS, the Parties now seek, for the first time, to extend the remaining  
14 case deadlines, as set forth below;

15 WHEREAS, good cause supports the requested extension, which is driven by  
16 witness availability and the Parties' joint and good faith efforts to establish a feasible  
17 schedule to accommodate witness availability while completing the remainder of the  
18 case schedule as efficiently as possible. Because key witnesses are unavailable for  
19 depositions until late October or early November, the expert report deadline (October  
20 21, 2024) and fact discovery cutoff (November 11, 2024) cannot hold, as the Parties  
21 will not have sufficient time to obtain deposition transcripts, process the content, and  
22 potentially incorporate that information into reports or seek related discovery.

23 Subsequent deadlines, such as the expert discovery cutoff and the final day to file a  
24 dispositive motion, must then shift too, to permit the case to proceed in the  
25 appropriate order of events. As needed, the Parties have also included minor  
26 adjustments to the proposed case schedule to account for holidays. Accordingly, the  
27 Parties have conferred and agreed—subject to the Court's approval—to extend the  
28 remaining case schedule as set forth below:

	<b>Current Dates</b>	<b>Proposed Dates</b>
Expert Reports Due	October 21, 2024	November 18, 2024
Fact Discovery Cutoff	November 11, 2024	December 16, 2024
Expert Rebuttals Due	November 11, 2024	December 16, 2024
Expert Discovery Cutoff	December 16, 2024	January 20, 2025
Last Day to File Motion for Summary Judgment	December 9, 2024	February 3, 2025
Last Day to File Other Motions to be Heard	December 16, 2024	February 3, 2025
Last Day for Settlement Conference	January 6, 2024	March 3, 2025
Last Day to Have Motion Heard	January 13, 2025	March 10, 2025
Proposed Pretrial Conference Order, Memoranda and Contentions of Fact and Law, Joint Witness Lists, Joint Exhibit List, and Exhibit Stipulation and Proposed Findings of Fact and Contentions of Law	February 24, 2025	April 21, 2025
Motions in Limine	February 26, 2025	April 23, 2025
Final Pre-Trial Conference	March 3, 2025	April 28, 2025
Oppositions to Motions in Limine	March 5, 2025	May 2, 2025
Hearing on Motions in Limine	March 17, 2025	May 12, 2025
Final Trial Exhibit Stipulation Due	March 20, 2025	May 19, 2025
Bench Trial	March 28, 2025	May 28, 2025

WHEREAS, all Parties have agreed to the requested extensions; and

WHEREAS, no Party will be prejudiced by the requested extensions and this stipulation is not made for the purpose of delay or any other improper purpose.

IT IS HEREBY STIPULATED AND AGREED, by and between the Parties hereto—subject to the Court's approval—that the case shall proceed according to the above extended case schedule set forth as the “Proposed Dates.” A proposed order reflecting this relief is being filed along with this stipulation.

1 Dated: September 25, 2024

2  
3  
4  
5  
6  
7  
**ARNOLD & PORTER KAYE SCHOLER  
LLP**

8 By: /s/ James F. Speyer

9 James F. Speyer

10 Ian S. Hoffman (*pro hac vice*)  
ian.hoffman@arnoldporter.com  
601 Massachusetts Avenue, NW  
Washington, DC 20001-3743  
Telephone: +1 202.942.6406

11 Attorneys for Defendant  
12 EPOCH EVERLASTING PLAY, LLC

13 Dated: September 25, 2024

14  
15  
16  
17  
18  
**K&L GATES LLP**

19 By: /s/ Kevin S. Asfour

20 Kevin S. Asfour

21 Jennifer J. Nagle (*pro hac vice*)  
jennifer.nagle@klgates.com  
22 Robert W. Sparkes, III (*pro hac vice*)  
robert.sparkes@klgates.com  
23 Michael R. Creta (*pro hac vice*)  
michael.creta@klgates.com  
1 Congress Street  
Boston, MA 02114  
Telephone: (617) 261-3100

24 Attorneys for Defendant  
25 AMAZON.COM SERVICES LLC

26 Dated: September 25, 2024

27  
28  
**WADE KILPELA SLADE LLP**

29 By: /s/ Gillian L. Wade

30 Gillian L. Wade

31 Sara D. Avila  
Marc A. Castaneda

32  
33  
**WADE KILPELA SLADE LLP**

34 David F. Slade (*pro hac vice*)  
dslade@wh.law  
35 1 Riverfront Pl., Ste. 745  
36 North Little Rock, AR 72114  
37 Telephone: (501) 404-2052

38  
**DURHAM, PITTARD & SPAULDING,  
39 LLP**

40 Justin R Kaufman (*pro hac vice*)

41 - 3 -

1 jkaufman@dpslawgroup.com  
2 Philip Kovnat (*pro hac vice*)  
3 pkovnat@dpslawgroup.com  
505 Cerillos Rd., Ste. A209  
3 Santa Fe, NM 87501  
4 Telephone: (505) 986-0600

5 **MARTIN WALKER**  
6 Jack Walker (*pro hac vice*)  
7 jwalker@martinwalker.com  
121 N. Spring Ave.  
7 Tyler, TX 75702  
8 Telephone: (903) 526-1600

9 Attorneys for Plaintiff and Putative Class

10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

## ATTESTATION OF CONCURRENCE

Pursuant to Civil L.R. 5-4.3.4(a)(2)(i), the filer attests that all other signatories listed, and on whose behalf this filing is submitted, concur in the filing's content and have authorized the filing.

Dated: September 25, 2024

# ARNOLD & PORTER KAYE SCHOLER LLP

By: /s/ James F. Speyer  
James F. Speyer

Ian S. Hoffman (*pro hac vice*)  
ian.hoffman@arnoldporter.com  
601 Massachusetts Avenue, NW  
Washington, DC 20001-3743  
Telephone: +1 202.942.6406

Atorneys for Defendant  
EPOCH EVERLASTING PLAY, LLC